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March 25, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street  
Room 222  
Washington, D.C. 20554

Re: Ex-Parte Presentation  
Amendment of the Commission's Rules to Establish  
New Personal Communications Services, GEN Docket No.  
90-314; ET Docket No. 92-100; Redevelopment of  
Spectrum to Encourage Innovation in the Use of New  
Telecommunications Technologies, ET Docket  
No. 92-9.

Dear Ms. Searcy:

In accordance with Section 1.1206(a)(2) of the  
Commission's Rules 47 C.F.R. § 1.1206(a)(2) (1991) this is

Should you have any questions regarding this matter,  
please call me at (202) 429-7249.

Respectfully submitted,

*R. Michael Senkowski*

R. Michael Senkowski

Encl.

cc: Robert M. Pepper  
Stevenson S. Kaminer  
Linda L. Oliver  
Byron F. Marchant  
Ralph A. Haller  
Thomas P. Stanley  
Brian F. Fontes  
Kathleen Q. Abernathy

## **UNLICENSED PERSONAL COMMUNICATIONS SERVICES: STEPS TO MAKING DEPLOYMENT A REALITY**

**Unlicensed PCS Can Bring Enormous Benefits to the Public and the Country.** The FCC has proposed allocating spectrum for important new unlicensed PCS offerings. This FCC contribution to improving the nation's telecommunications infrastructure is significant in several major respects:

- **Unlicensed PCS consists of wireless data, voice and messaging systems and devices operating at low power with high portability. Portable units may talk directly to other portable units or through a site located system. Unlike licensed PCS, which is focused on wide area service, Unlicensed PCS fills the void for "on site" or campus wide service. With the need for licensing removed, prospective buyers will be able to purchase equipment with ease, convenience and confidence.**
- **There is an huge consumer demand for Unlicensed PCS representing a market of millions of devices worth billions of dollars.**
- **Unlicensed PCS will provide tremendous opportunities for U.S. manufacturers to improve the nation's telecommunications infrastructure and continue its leadership in global telecommunications markets.**
- **The U.S. economy can be strengthened and new jobs created with implementation of Unlicensed PCS.**

**The Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management ("UTAM") Is Addressing the Challenges of Ensuring that Existing Microwave Users Are Protected from Interference and Relocated Consistent with Commission Requirements.<sup>1</sup> Companies representing a broad cross section of American industries related to computing, telecommunications and business equipment have formed UTAM to recommend regulatory actions to promote timely deployment of unlicensed PCS offerings. This requires solutions to some major problems:**

- **The Unlicensed PCS industry will have to find funding for at least \$68.00 million in costs associated with relocating microwave**

- The Unlicensed PCS industry must assume responsibility for managing the relocation process, satisfying microwave licensee concerns, and resolving any disputes.
- A system of ensuring equitable Unlicensed PCS industry participation in the funding and management of these challenges is necessary.

**An Open Industry Entity Will Be Necessary for Implementation of Unlicensed PCS.** As a result of extensive meetings among prospective suppliers of unlicensed systems and devices, UTAM has reached consensus that participation of all suppliers of unlicensed PCS equipment in an open industry entity is needed to assume relocation and spectrum management functions. The Unlicensed PCS entity should be formed consistent with the following principles:

1. Ultimately, there is a requirement for clear spectrum for the viable deployment of Unlicensed PCS, i.e. unlicensed roaming devices.
2. There is a requirement for a mechanism to clear the spectrum for Unlicensed PCS.
3. The clearing mechanism should include an industry entity. The entity would negotiate with incumbents, collect funds from manufacturers, and disperse funds for the move.
4. In order to facilitate the early introduction of Unlicensed PCS, relocation of the 2 GHz microwave incumbents should commence immediately and be concluded as rapidly as possible.
5. Problematic 2 GHz links should have priority access to the Federal Government spectrum at 1710 to 1850 MHz.
6. UTAM supports FCC equipment authorization which requires participation in the entity.
7. The entity should be open and structured to permit participation by any party with a material interest in the relocation of microwave incumbents from the unlicensed band.
8. The entity should assume a spectrum management role during the transition, for devices deployed before the band is cleared.

**Timely FCC Action Is Essential.** Unlicensed PCS cannot proceed unless and until affirmative Commission action is taken to allocate spectrum and recognize the role of an open industry entity to handle transition issues. UTAM is currently considering detailed recommendations addressing all critical aspects of the challenges facing the Commission and Industry.

## **Participants in the Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management:<sup>1</sup>**

### **Companies**

AT&T  
Alcatel  
Ameritech  
Apple  
Ericsson  
Intel  
LCC Incorporated  
Locate  
Metrocall  
Motorola  
Northern Telecom  
Omniipoint  
Rolm  
Rose Communications  
Siemens Stromberg-Carlson  
Sprint  
Telesciences  
Time Warner Tel  
US West

### **Organizations**

Bellcore  
NATA  
PCCA  
Telocator  
USTA  
WINForum

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<sup>1</sup> The attached proposal represents the consensus views of the Committee and should not be ascribed to any individual member.

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